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May 12, 2004

VIA HAND DELIVERY

Deborah T. Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**Re: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
Docket No. 03-00633**

Dear Chairman Tate:

On behalf of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives, we have enclosed for your review 13 copies of the May 10, 2004 response of the National Telecommunications Cooperative Association and its Chief Executive Officer, Michael E. Brunner, to the letter from Stan Wise that was submitted for your consideration yesterday by Mr. Malone, counsel for Verizon Wireless.

If you have any questions or would like to see additional information, please let me know

Sincerely,


Tara L. Swafford

TLS:bb
Enclosure

cc: Melvin J. Malone, Esq.
Timothy C. Phillips, Esq.
R. Dale Grimes, Esq.
Stephen Kraskin, Esq.

FCC Criticism of Rural ILEC Extension Request Unfounded - Association Points to Lack of FCC Foresight as Cause of LNP Compliance Issues

May 10, 2004, Arlington, Va. - In response to recent criticism from the Federal Communications Commission (FCC) regarding rural incumbent local exchange carrier (ILEC) requests for an extension of the proposed deadline for local number portability (LNP) compliance, the National Telecommunications Cooperative Association (NTCA) issued the following statement

"Contrary to the opinion of the FCC and large wireless carriers, rural carriers are not being obstructionists. They are moving forward and will achieve full LNP compliance, despite having to confront issues created by guidelines drafted with only the large carriers in mind, said NTCA Chief Executive Officer Michael E. Brunner.

"If the commission had issued a notice of proposed rulemaking and performed the necessary regulatory flexibility analysis, many of the rural technical and operational issues would have surfaced during the public comment period."

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"There are rating and transport issues that have not been addressed for the rural carriers.

"Further, rural carriers are being bombarded with blanket requests seeking compliance from carriers who do not have viable wireless service in their territories. We have documented cases where requests have been made from wireless providers, who do not have a single cell site or even a license within the request area. To comply with FCC regulations, our members have to wade through these requests, as well as comply with legitimate ones in a timely manner."

"NTCA strongly believes that any issues surrounding LNP should be reviewed on a case-by-case basis, as the law provides. The FCC should not attempt to influence the states as they review requests for suspension or modification of the LNP requirements. The states are in the best position to determine what is best for the consumers and carriers in their locality."

"NTCA, along with the Organization for the Promotion and Advancement of Small Telephone Companies, has an appeal pending on the LNP decision, which addresses many of these issues.

"The law and the FCC's rules afford carriers certain avenues to request relief and the FCC should not criticize when a carrier chooses to exercise those rights. The way the clarification was written, it is clear that the operational realities of rural carriers was not even considered by the commission. Thus, these issues remain outstanding. We are hopeful that given the vast technical challenges our members are working hard to overcome, the states and the federal commission will treat each request fairly and review the merits of each unique situation, case by case," Brunner concluded.

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